

REMARKS

Applicants respectfully request reconsideration and allowance of the above-identified patent application. By this paper, claims 1-16 and 18-28 remain pending, wherein claims 1-4, 6-11, 15, 16, 18-20, 22, 23, and 25-28 have been amended and claim 17 has been canceled. Of the pending claims, claims 1 and 16 are independent claims.

Initially, Applicants and Applicants' Attorney express appreciation to the Examiner and the Examiner's supervisor for the courtesies extended during the telephonic interview recently held on July 13, 2007. The foregoing amendments and following arguments are consistent with those presented and discussed during the interview.

In the Office action, claims 1 and 16 are rejected under 35 U.S.C. § 112, second paragraph, as allegedly being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. More specifically, these claims have been rejected for various informalities including the use of the following terms: "an interface"; "an application program interface"; and "a scope of input for a text field". Applicants respectfully note that these claims have been amended in order to address those concerns raised by the Examiner. Accordingly, Applicants respectfully request withdrawal of these grounds of rejection.

Next, the Office action rejects claims 1-28 under 35 U.S.C. § 101 as allegedly directed toward non-statutory subject matter. With regard to claims 15 and 18, the Office action alleges that in view of Applicants' disclosure and the language in these claims that it is unclear whether the claimed computer-readable includes signal entities. In the interest of expediting prosecution of the current application, Applicants have amended these claims in order to make clear that the computer readable media is storage media, e.g., RAM, CD-ROM, etc.¹ Accordingly, Applicants respectfully request withdrawal of this ground of rejection.

¹ Nevertheless, Applicant reserves the right to further challenge this ground of rejection by way of presenting corresponding claims that define the computer readable medium in terms consistent with the breadth of that term as provided in Applicant's specification in any related application, as deemed appropriate by Applicant.

Applicant respectfully submits that there is sound policy reasons why a signal, carrier wave or "connection" used to provide software to users should be treated no differently for purposes of patent eligibility than a computer disc such a CDROM or floppy disk. On a strictly factual basis, a signal, carrier wave or other connection that transmits a data signal is not simply a form of "energy or magnetism". Simply because this data is transmitted does not change the reality that such a medium nonetheless is real and is used every day to transmit and download

The Office action also rejects claims 1 and 16 under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter. As discussed and generally agreed to during the interview, Applicants have amended the independent claims to address the concerns raised by the Examiner. Accordingly, Applicants respectfully request withdrawal of this ground of rejection.

Next, the Office action rejects the independent claims under 35 U.S.C. § 102(b) as allegedly being anticipated by U.S. Patent No. 6,359,572 to Vale (*"Vale"*).² Applicants respectfully traverse this ground of rejection.

Applicants' invention generally relates to providing context information of executable code to an input method. In typical applications, some of the most common fields of an application and of forms expect input that may not conform to the language rules of a specific language. For example, an email field may expect an email address as input; however, most, if not all, email addresses do not conform to the language rules or vocabulary of a specific language. More specifically, English language rules that require, for example, a space between words, which does not apply to an email address. Similarly, a field may expect a Uniform Resource Locator (URL), which also may not conform to the language rules or vocabulary of a specific language. Nevertheless, other fields in the application may conform to the use of such specific language rules or vocabulary. As a result, such input methods may be severely limited in their ability to accurately recognize input for varying types of input fields.

In order to overcome such deficiencies, embodiments allow input scopes to be set and used for each varying input field of an application. As used herein, an input scope is a subset of a language that is used to define what words, numbers, and/or punctuation can be written and in what order they may be written. Such input scopes are used by applications to restrict the

software data just as effectively as software contained on a CDROM. Thus, to deny patent eligibility for such claims is to ignore the reality that such media is most certainly employed in the using and selling of software carried by such a medium, and thus denies claims to a patent owner that would otherwise provide a basis for asserting direct infringement against competitors, thereby relegating such subject matter to assertions of indirect infringement only, with no sound policy basis for doing so. In other words, to deny such computer program products of patent protection on this basis appears to be exalting form over substance.

Moreover, the asserted reason for treating so-called "signal" claims differently from other kinds of computer readable media (e.g., that it does not appear that a claim reciting a signal encoded with functional descriptive material falls within any of the categories of patentable subject matter set forth in 35 U.S.C. § 101) also lacks merit. Executable instructions on a disk or CDROM, like those carried by a signal or connection, also cannot be understood or executed until those computer-executable instructions are off-loaded from the disk or CDROM into the computer's RAM. This is no different for a carrier signal or connection, and hence the asserted factual comparison to energy or magnetism simply lacks merit.

language model used by a recognizer of an input method to the type of text input an application is expecting in a text field. As such, the present invention enables advanced input methods to achieve a higher accuracy recognition rate for text input to application fields by providing an architecture that supports applications or forms to specify what type of text input they are expecting in their text fields.

Claim 16 is directed toward such embodiments and recites a method for providing context information to an input method for enabling advanced input methods to achieve a higher accuracy recognition rate for text input to application fields by providing an architecture that supports applications or forms to specify what type of text input they are expecting in their text fields. Claim 16 further includes the following: (1) invoking by executable software code a first application programming interface for setting input scopes for a plurality of text fields for an application, wherein an input scope is a subset of a language used to define what one or more words, numbers, or punctuations can be written and in what order they may occur to form a sequence of text characters in a text field; (2) using the first application programming interface for setting a first input scope for a first text field of the application, the first input scope chosen from a plurality of available input scopes including one or more of a list of input scopes, a list of words or phrases, a common input scope, or a custom input scope; (3) using the first application programming interface for setting a second input scope for a second text field of the application, the second input scope chosen from the plurality of input scopes, which is different from the first input scope set for the first text field; (4) invoking a second application programming interface by a recognizer for obtaining one or more of the input scopes set for the plurality of text fields of the application; (5) using the second application programming interface for applying the first input scope set for the first text field of the application such that as a first sequence of text characters are entered into the first text field, the first sequence of text characters are compared with text with the first input scope set in order to determine what text input is expected by the application for the first text field; and (6) using the second application programming interface for applying the second input scope set for the second text field of the application such that as a second sequence of text characters are entered into the second text field, the second sequence of

² Although the prior art status of the cited art is not being challenged at this time, Applicant(s) reserve the right to challenge the prior art status of the cited art at any appropriate time, should it arise. Accordingly, any arguments and amendments made herein should not be construed as acquiescing to any prior art status of the cited art.

text characters are compared with text within the second input scope set in order to determine what text input is expected by the application for the second text field.

Applicants respectfully submit that the cited *Vale* does not render claim 1 unpatentable for at least the reason that the cited reference does not disclose each and every element of Applicants' claimed invention.³ For example, the *Vale* reference does not disclose using one interface for setting input scopes for various text fields of an application, and using another interface for applying the different input scopes in order to determine what text input is expected by the application for the various text fields, as generally recited in claim 16.

Vale discloses a dynamic keyboard that allows a specific key to vary based on a probability or prediction of what next key a user may input. As discussed and generally agreed to during the interview, although *Vale* may vary the prediction based on a particular type of field (e.g., using letters for name field and numbers for a phone field), *Vale* is silent with respect to invoking an interface for allowing a scope input to be set for any particular application text field. As such, *Vale* cannot possibly disclose those features note above with regard to claim 16.

Claim 1 recites a system with elements similar to those described above with regard to claim 16. As such, this claim is patentably distinct over the cited art of record for at least those reasons stated above with regard to claim 16.

Based on at least the foregoing reasons, Applicants respectfully submit that the cited prior art fails to anticipate Applicants' invention as claimed for example, in independent claims 1 and 16. Applicants note for the record that the remarks above render the remaining rejections of record for the independent and dependent claims moot, and thus addressing individual rejections or assertions with respect to the teachings of the cited art is unnecessary at the present time, but may be undertaken in the future if necessary or desirable and Applicants reserve the right to do so.

All objections and rejections having been addressed, Applicants respectfully submit that the present application is in condition for allowance, and notice to this effect is earnestly

³ "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." MPEP § 2131. That is, "for anticipation under 35 U.S.C. 102, the reference must teach every aspect of the claimed invention either explicitly or impliedly." MPEP § 706.02. Applicant also note that "[i]n determining that quantum of prior art disclosure which is necessary to declare an applicant's invention 'not novel' or 'anticipated' within section 102, the stated test is whether a reference contains an 'enabling disclosure.'" MPEP § 2121.01. In other words, a cited reference must be enabled with respect to each claim limitation.

solicited. Should any questions arise in conjunction with this application or should the Examiner believe that a telephone conference with the undersigned would be helpful in resolving any remaining issues pertaining to this application, the undersigned respectfully requests that he be contacted at 1-801-533-9800.

DATED this 21st day of September, 2007.

Respectfully Submitted,

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